

REMARKS

Claims 1-56 have been canceled without prejudice or disclaimer. Claims 57-87 have been added. Applicants submit that no new matter has been added by way of these additional claims. Applicants respectfully request reconsideration of the above-identified application, in view of the following remarks.

Addition of New Claims 57-87

With this response, Applicants add new claims 57-87. No new matter has been added. Applicants respectfully submit that these new claims are allowable over the cited art.

Claim Rejections – 35 U.S.C. § 103

Claims 1-3, 5-9, 11, 45-53, and 56 have been rejected under 35 U.S.C. § 103(a) over Gabber, et al. (US Patent No. 5,961,593) (“Gabber”), in view of Grantges et al. (US Patent No. 6,510,464) (“Grantges”). Claims 4, 10, 12, and 54-55 were objected to as being dependent upon a rejected based claim, but would be allowable if rewritten in independent form.

Applicants thank the Examiner for the indication that Claims 4, 10, 12 and 54-55 have been deemed to contain allowable subject matter but have been objected to as being dependent on a rejected base claim.

Applicants have added new claims 57-87, which are believed to be in condition for allowance.

Independent claim 57 recites, *inter alia*:

A method comprising:

setting up a forwarding session between the client and a destination server corresponding to the destination website, the forwarding session employing a forwarder disposed between the client and the destination server to forward packets sent from the client to the destination server and to forward packets sent from the destination server to the client...

wherein the forwarding session is set up and implemented such that neither the client or the destination server is aware of the employment of the forwarder.

Applicants submit that the cited references do not disclose, teach or suggest at least the elements recited in claim 57.

Applicants submit that neither Gabber, nor Grantges teach, disclose or suggest a method implementing a forwarding session between a client and a destination server where neither the client or destination server are aware of the employment of a forwarder disposed between them.

Gabber is directed to a method and system for using a proxy server to browse server sites anonymously performing routine substitution of user information when a user visits the same website server. This system allows for “personalization based upon the consistent use of substitute identifiers.” (See, Gabber et. al, Col. 3, lines 8-11). More specifically, Gabber describes a proxy system that performs “automatic substitution of user-specific identifiers” and “automatic stripping of any other information associated with browsing commands that would allow the server sites to determine the true identity of the user” “consistently... during subsequent visits to the server site (the same substitute identifiers are used on repeat visits to the server site...)” (See, Gabber et. al, Col. 2, line 58 - col. 3, line 11). Thus, Gabber is directed to

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a system where the user and proxy server are each aware of the other and establish a connection whereby the proxy server provides “site-specific substitute identifiers” for the user to access a website. (See, Gabber et. al, Col. 6, line 59-65).

Similarly, Grantges is directed to a proxy system whereby the proxy provides a client computer access over a public network to an application on a destination server in a private network. (See, Grantges et. al., Col. 2, line 60 - col. 3, line 20). “The proxy server is configured to establish a secure connection with the client computer over the insecure, public network.” (See, Grantges et. al., Col. 2, line 60 - col. 3, line 20). In Grantges, a secure network connection is established between the user and proxy server through an authentication of a user-selected digital certificate sent to the proxy by the user to establish the secure connection. (See, Grantges et. al., Col. 4, line 33-65). Thus, similar to the proxy system described in Gabber, Grantges is directed to a proxy system where the user and proxy server are each aware of the other.

Applicants submit that the cited references do not teach, disclose or suggest the invention as claimed. For example, neither Gabber, nor Grantges, taken alone or in combination, discloses or suggests “setting up a forwarding session between the client and a destination server” “wherein the forwarding session is set up and implemented such that neither the client or the destination server is aware of the employment of the forwarder.” The client is deceived into thinking that the forwarder is actually the destination server.

Accordingly, for at least these reasons, Applicants respectfully submit that new independent claim 57 is patentably distinct from the cited references. Also, for at least these

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reasons, Applicants submit that new claims 58-73, which are directly or indirectly dependent on new independent claim 57, are also patentably distinct from the cited references.

Applicants further submit that new independent claim 74 is also patentably distinct from the cited references for at least grounds similar to those set forth above with respect to new independent claim 57.

Independent claim 74 recites, *inter alia*:

A method comprising:

setting up a forwarding session between the client and a destination server via the forwarder...

returning a packet to the client identifying the IP address of the forwarder as the IP address of the destination server.

Applicants submit that the cited references do not disclose, teach or suggest at least the elements recited in new independent claim 74.

As set forth above, Gabber and Grantges are directed to proxy servers where the client and proxy are aware of each other. In contrast, independent claim 74 describes a method that returns "a packet to the client identifying the IP address of the forwarder as the IP address of the destination server." The client is deceived into thinking that the forwarder is actually the destination server. Applicants submit that neither Gabber, nor Grantges teach, disclose or suggest a method where a forwarding session is set up between the client and destination server via the forwarder where the information transmitted to the client identifies the IP address of the forwarder as the IP address of the destination server.

Accordingly, for at least these reasons, Applicants respectfully submit that new independent claim 74 is patentably distinct from the cited references. Also, for at least these

reasons, Applicants submit that new claim 75, which is directly dependent on independent claim 74, is also patentably distinct from the cited references.

Applicants further submit that new independent claim 76 is also patentably distinct from the cited references for at least grounds similar to those set forth above with respect to new independent claim 57.

Independent claim 76 recites, *inter alia*:

A computer system comprising:

[a] forwarder configured for employment between the client and the destination server to forward packets sent from the client to the destination server and to forward packets sent from the destination server to the client...

configured to transfer packets between the client and the destination server, wherein the client and the destination server are unaware of the employment of said forwarder.

Applicants submit that the cited references do not disclose, teach or suggest at least the elements recited in new independent claim 76.

As set forth above, Gabber and Grantges are directed to proxy servers where the client and proxy are aware of each other. In contrast, independent claim 76 describes a computer system where a forwarder is employed between the client and destination server to forward data the client to the destination server and vice versa without the client or destination server knowing of the employment of the forwarder in between. Applicants submit that neither Gabber, nor Grantges teach, disclose or suggest a computer system as set forth in new independent claim 76.

Accordingly, for at least these reasons, Applicants respectfully submit that new independent claim 76 is patentably distinct from the cited references. Also, for at least these

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reasons, Applicants submit that new claims 77-87, which are directly or indirectly dependent on independent claim 76, are also patentably distinct from the cited references.

Descriptive Title Required

The title of the invention was objected to as not descriptive. Applicants have amended the title and respectfully request reconsideration of this objection.

CONCLUSION

Based on the foregoing remarks, it is respectfully submitted that the claims as currently pending are patentable and in condition for allowance. Reconsideration of the application and withdrawal of the rejections are respectfully requested.

In the event that a telephone conference would facilitate examination in any way, the Examiner is invited to contact the undersigned representative at the number provided.

Respectfully submitted,

MORGAN & FINNEGAN, L.L.P.

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By: _____


Tony V. Pezzano
Registration No. 38,271

Correspondence Address:
MORGAN & FINNEGAN, L.L.P.
3 World Financial Center
New York, NY 10281
(212) 415-8700 (telephone)
(212) 415-8701 (facsimile)